

**INFORMATION COLLECTION REQUEST (ICR) RENEWAL
FOR THE PART 70 OPERATING PERMITS REGULATIONS**

**PROGRAM BURDEN ESTIMATES
FOR THE PERIOD FROM 2/28/00 TO 2/28/03**

DATE OF ESTIMATES: OCTOBER 4, 1999

The attached tables 1 and 2 contain estimates of the hourly burden for permitting authorities and subject sources, respectively, to implement the part 70 operating permits program. These estimates will be used to prepare the updated ICR for the part 70 operating permits regulations. This updated ICR will be for the 3-year period from February 28, 2000 (when the current ICR expires) until February 28, 2003.

The activities for which the burden estimates are provided are the activities projected to occur during this 3-year ICR update period. The attached sheets of assumptions reflect the projected activities. Several State and local permitting authorities and EPA Regional Offices were contacted to obtain information regarding the expected activities and the average hourly burden associated with those activities.

The fourth column of tables 1 and 2 contain the total burden for each activity for the 3-year period of the ICR renewal. These values were added to provide a program total burden. Hourly totals were multiplied by \$36.00/hour for permitting authorities and \$47.75/hour for sources to obtain a dollar value. These hourly values were determined from an economic analysis of the average hourly cost of in-house permitting authority and contracted source activities.

ASSUMPTIONS FOR ICR RENEWAL

TIME PERIOD:

February 28, 2000 to February 28, 2003 (shown as March 2000 to March 2003)

PERMIT ISSUANCE:

- ! Total population of title V sources = 20,246
- ! 51% of the permits will be issued by March 2000
 - 7,900 permits issued as of August 1999
 - Assume permit issuance rate of 2% per month until March 2000
 - Around 2430 additional permits will therefore be issued by March 2000
 - Total is $2,430 + 7,900 = 10,330$ by March 2000 (leaving 9916 permits to be issued)
- ! Assume a 3% issuance rate per month after March 2000
 - Therefore, 36% additional permits will be issued by March 2001 (i.e., 7289 permits issued in the first year of the ICR)
 - Total of 17,619 permits issued by March 2001
 - The final 13% of the total permits will be issued by March 2002 (i.e., 2627 additional permits during the second year of the ICR)
- ! General permits
 - Assume 20% of all permits will be general permits
 - 17% of all issued permits will be general permits on March 1, 2000 (3442 of the 10,330 issued permits)
 - An additional 2% of total permits (405 permits) will be issued as general permits in the first year of the ICR (i.e., 405 of the 7289 permits issued that year)
 - An additional 1% of total permits (202 permits) will be issued as general permits in the second year of the ICR (i.e., 202 of the 2627 permits issued that year)
- ! Single source permits (other than general permits) which will be subject to the full permit issuance process
 - 9916 permits will be issued during the period of the ICR (7289 in year 1 and 2627 in year 2)
 - 607 of these will be general permits (405 in year 1 and 202 in year 2)
 - $9916 - 607 = 9309$ single source permits issued during the period of the ICR
 - Add in 150 new sources (see below): $9309 + 150 = 9459$ single source permits

issued during the 3-year period of the ICR
ASSUMPTIONS (cont.)

PERMIT RENEWAL:

- ! By March 1997, 1493 permits had been issued (all within the previous year, renewal therefore will be during the year from March 2001 to March 2002) - assume 16%, or 239, are general permits (this is from past data)
- ! By March 1998, an additional 1952 permits had been issued - these will be up for renewal between March 2002 and March 2003 - assume 16%, or 312, are general permits

SYNTHETIC MINOR PERMITS:

All synthetic minor permits had been issued prior to March 2000 so no burden is included during the term of the ICR

NEW SOURCES:

There will be approximately 50 new major sources nationwide applying for a title V permit each year during the term of the ICR (150 total for the 3 years of the ICR)

TABLE 1

PERMITTING AUTHORITY ACTIVITIES

ACTIVITY	BURDEN PER INDIVIDUAL PERMIT OR PROGRAM	COMMENTS	TOTAL PROGRAM BURDEN FOR 3 YEARS
Program administration: Responding to inquiries about the program, developing internal and external program guidance, planning, attending program training, permit fee collection, providing source training, attending EPA meetings and conferences, providing public education, and other program related activities.	2080 hrs per agency	One work year per agency on average 116 agencies	241,280 hrs. per year 723,840 for 3 years of ICR
Reviewing a permit application, including discussions with a source concerning the permit application.	100 hrs./permit	Assume 50 new sources per year nationwide	5,000 per year 15,000 for 3 years of ICR
Preparing a draft permit, including contact with the source.	150 hrs./permit	9459 permits issued during 3-year ICR time period (takes out the 607 general permits, adds back 150 new sources)	1,418,850 for 3 years of ICR
Providing notice to the public, EPA, and affected States of the comment period on a draft permit.	10 hrs./permit	9459 draft permits during ICR time period	94,590 for 3 years of ICR
Holding a public hearing on a permit.	100 hrs./hearing	Assume a hearing for 1 in 50 of the 9459 new permits-189 hearings	18,900 for 3 years of ICR

Interaction with EPA on a proposed permit, including negotiations, re-drafting, and formal EPA objections (including those attributable to public petitions).	20 hrs./permit	9459 proposed permits during ICR time period	189,180 for 3 years of ICR
TABLE 1 (cont.)			
Analyzing public comments and revising the permit accordingly	40 hrs./permit	Assume comments on 1 in 10 permits (946 permits)	37,840 for 3 years of ICR
Issuing the permit, including web activities and source notification.	8 hrs./permit	9459 new permits issued during ICR time period	75,672 for 3 years of ICR
Administering general permits (Burden for issuing general permits included with other permit issuance burden)	80 hrs per agency per year	116 agencies	9280 per year 27,840 for 3 years of ICR
Revising a permit.	N/A	Number of issued permits: year 1 - 10,330 year 2 - 17,619 year 3 - 20,246	N/A
• Significant (1 out of every 10 issued permits per year)	60 hrs each	61,980 yr 1 105,714 year 2 121,476 year 3	289,170 for 3 years of ICR
• Minor (1 out of every 2 issued permits per year)	20 hrs each	103,300 yr 1 176,190 yr 2 202,460 yr 3	482,000 for 3 years of ICR
• Administrative (1 out of every 2 issued permits per year)	5 hrs each	25,825 yr 1 44,047 yr 2 50,615 yr 3	120,487 for 3 years of ICR
Renewing a permit (reviewing application, drafting any changes, public notice, issuance).	60 hrs./permit	2894 renewals during ICR term	173,640 for 3 years of ICR
Reviewing two semiannual monitoring reports, and the annual compliance certification.	15 hrs./permit (5 hrs. each)	154,950 - yr 1 264,285 - yr 2 303,690 - yr 3	722,925 for 3 years of ICR

TOTAL FOR PERMITTING AUTHORITIES:

4,389,934 hours for 3 years \div 3 = 1,463,311 hours per year

1,463,311 hours times \$36/hour = \$52,679,196/year

TABLE 2
SOURCE ACTIVITIES

ACTIVITY	BURDEN PER SOURCE	COMMENTS	TOTAL PROGRAM BURDEN FOR 3 YEARS
Preparing a permit application, including internal meetings, permitting authority discussions, management and legal department involvement, responsible official certification, contractor services.	200 hrs.	Assume 50 new sources per year nationwide	10,000 hrs per year 30,000 for 3 years of ICR
Interaction with the permitting authority on draft permit development.	40 hrs.	Assume 50 new sources per year nationwide 2,000 hrs per year	6,000 for 3 years of ICR
Development of periodic monitoring gap-filling	40 hrs. per source	Assume gap-filling for 50% of 9459 sources getting permits during ICR time period	189,180 for 3 years of ICR
Public hearing participation.	10 hrs. (1 in 50 new permits get hearing)	9459 new permits during ICR period 1 in 50 = 189 sources	1,890 for 3 years of ICR
Operation of gap-filling periodic monitoring (annual burden to operate monitors, keep records, etc.).	200 hrs. per year	Assume gap-filling for 50% of sources: 5,165 - yr 1 8,809- yr 2 10,123 - yr 3	1,033,000 - yr 1 1,716,900 - yr 2 2,024,600- yr 3 4,774,500 for 3 years of ICR
Preparing semi-annual monitoring data reports, including data analysis, responsible official certification, and report submission (annual burden for both reports). Include preparing and submitting annual compliance certification.	80 hrs. per year	Sources: 10,330 - yr. 1 17,619 - yr 2 20,246 - yr. 3	826,400 - yr 1 1,409,520 - yr 2 1,619,680 - yr 3 3,855,600 for 3 years of ICR

TABLE 2 (cont.)			
Preparing application for permit revisions.			
<ul style="list-style-type: none"> Significant permit modification 	80 hrs	(assume 1 per 10 sources per year) 1,033 - yr. 1 1,762 - yr. 2 2,025 - yr. 3	82,640 - yr 1 140,960 - yr 2 162,000 - yr 3 385,600 for 3 years of ICR
<ul style="list-style-type: none"> Minor permit modification 	40 hrs	(Assume 1 of every 2 sources per year) 5,165 - yr. 1 8,809 - yr. 2 10,123 - yr. 3	206,600 - yr 1 352,360 - yr 2 404,920 - yr 3 963,880 for 3 years of ICR
<ul style="list-style-type: none"> Administrative amendment 	8 hrs.	(Assume 1 of every 2 sources per year) 5,165 - yr. 1 8,809 - yr. 2 10,123 - yr. 3	41,320 - yr 1 70,472 - yr 2 80,984 - yr 3 155,586 for 3 years of ICR
Preparing an application for permit renewal.	80 hrs.	3445 renewals during ICR term	275,600 for 3 years of ICR
Other activities associated with permit renewal, including discussions with permitting authority and public hearing participation.	10 hrs.	3445 renewals during ICR term	34,450 for 3 years of ICR

TOTAL FOR SOURCES:

10,672,286 hours for 3 years ÷ 3 = 3,557,429 hours per year

3,557,429 hours times \$47.75/hour = \$169,867,230/year

PROGRAM TOTAL

4,389,934 hours (permitting authorities) + 10,672,286 hours (sources) =
15,062,220 total hours for 3 years

15,062,220 total hours \div 3 = 5,020,740 hours per year for permitting authorities and sources to
implement the part 70 program

\$52,679,196 per year (permitting authorities) + \$169,867,230 per year (sources) =
\$222,546,429 total cost per year for permitting authorities and sources to implement the part 70
program